

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Virginia Milanes, *et al.*
Plaintiffs

08 CV 2354

- against -

**MOTION TO ADMIT
COUNSEL *PRO HAC*
*VICE***

Michael Chertoff, *et al.*
Defendants

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, VIRGINIA H. JOHNSON, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

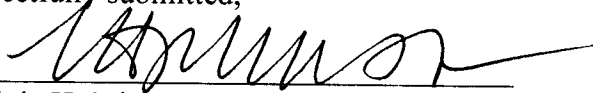
MALICK W. GHACHEM
Weil, Gotshal & Manges LLP
100 Federal Street
Boston, MA 02110-1848
Phone: 617-772-8300
Fax: 617-772-8333

MALICK W. GHACHEM is a member in good standing of the Bar of the Commonwealth of Massachusetts.

There are no pending disciplinary proceedings against MALICK W. GHACHEM in any State or Federal court.

July 8, 2008
Boston, Massachusetts

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Johnson", written over a horizontal line.

Virginia H. Johnson

SDNY Bar #: VJ-7672

Weil, Gotshal & Manges LLP

100 Federal Street, 34th Floor

Boston, MA 02110-1848

Phone: 617-772-8300

Fax: 617-772-8333

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Virginia Milanes, *et al.*
Plaintiffs

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**AFFIDAVIT OF
VIRGINIA H. JOHNSON
IN SUPPORT OF
MOTION TO ADMIT
COUNSEL *PRO HAC*
*VICE***

Commonwealth of Massachusetts)
)
Suffolk County) ss:

VIRGINIA H. JOHNSON, being duly sworn, hereby deposes and says as follows:

1. I am an associate at Weil, Gotshal & Manges LLP. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit MALICK W. GHACHEM as counsel *pro hac vice* to represent Plaintiffs in this matter.
2. I am a member in good standing of the bar of the State of New York. I am also admitted to the bar of the United States District Courts for the Southern and Eastern Districts of New York, and am in good standing with this Court.
3. I have known MALICK W. GHACHEM since October 2007.
4. MALICK W. GHACHEM is an associate at Weil, Gotshal & Manges LLP, in Boston, Massachusetts.
5. I have found MALICK W. GHACHEM to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of MALICK W. GHACHEM, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of MALICK W. GHACHEM, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit MALICK W. GHACHEM, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

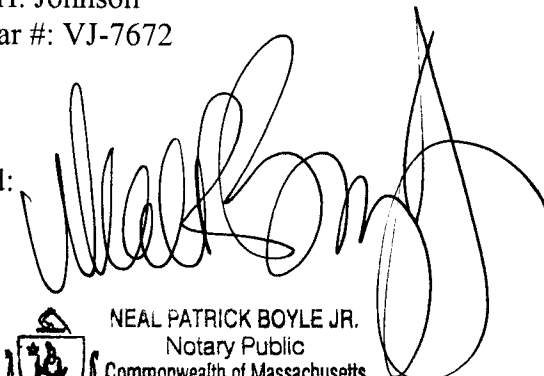

July 8, 2008
Boston, Massachusetts

Respectfully submitted,



Virginia H. Johnson
SDNY Bar #: VJ-7672

Notarized:

NEAL PATRICK BOYLE JR.
Notary Public
Commonwealth of Massachusetts
My Commission Expires
October 27, 2011

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Virginia Milanes, *et al.*
Plaintiffs

08 CV 2354

- against -

Michael Chertoff, *et al.*
Defendants

**ORDER FOR
ADMISSION *PRO HAC*
VICE ON WRITTEN
MOTION**

Upon the motion of VIRGINIA H. JOHNSON and said sponsor attorney's
affidavit in support;

IT IS HEREBY ORDERED that

MALICK W. GHACHEM
Weil, Gotshal & Manges LLP
100 Federal Street
Boston, MA 02110-1848
Phone: 617-772-8300
Fax: 617-772-8333
malick.ghachem@weil.com

is admitted to practice *pro hac vice* as counsel for Plaintiffs in the above-captioned case
in the United States District Court for the Southern District of New York. All attorneys
appearing before this Court are subject to the Local Rules of this Court, including the
Rules governing discipline of attorneys. If this action is assigned to the Electronic Case
Filing (ECF) system, counsel shall immediately apply for an ECF password at
nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

RECEIVED
JUL 10 2008
CLERK OF COURT
SOUTHERN DISTRICT OF NEW YORK

RECEIVED
JUL 10 2008
CLERK OF COURT
SOUTHERN DISTRICT OF NEW YORK

SO ORDERED:

July 9, 2008


UNITED STATES DISTRICT JUDGE

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **thirteenth** day of **December** A.D. **2004**, said Court being the highest Court of Record in said Commonwealth:

Malick W. Ghachem

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the

seal of said Court, this **ninth** day of **July**

in the year of our Lord **two thousand and eight**.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

United States Court of Appeals

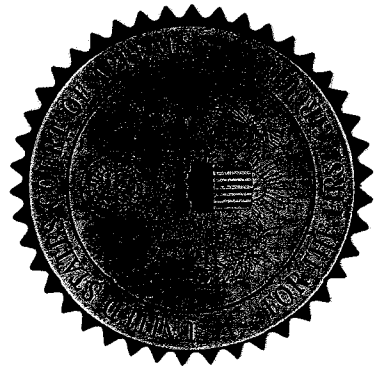


For the
First Circuit

Malick W. Ghachem

was admitted and qualified as an Attorney and Counsellor of the United States Court of Appeals for the First Circuit on the ninth day of February in the year of our Lord, two thousand and five, and the Independence of the United States of America the two hundredth and twenty-eighth year.

In testimony Whereof I, Richard Cushing Donovan, Clerk of said Court have hereunto set my hand and affixed the Seal of said Court, at the City of Boston, on the ninth day of February in the year of our Lord two thousand and five.



Richard C. Donovan

*Clerk of the United States Court of Appeals for the First Circuit
Court of Appeals Bar No. 103957*



District of Massachusetts

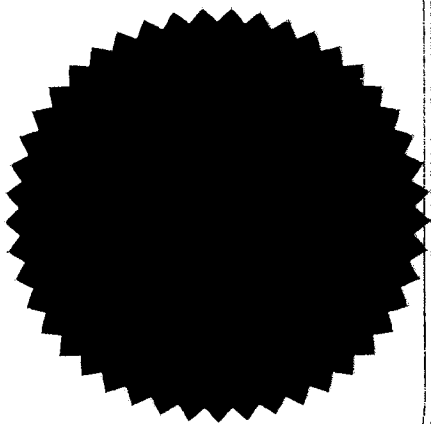
I, Sarah Allison Thornton Clerk of the United States District Court,

certify that

Malick W. Ghachem

was duly admitted and qualified to practice as an Attorney in the

District Court on the 24th *day of* March, 2005.



In testimony whereof, I sign my name and affix the seal of this
Court, on this 24th *day of* March, 2005.

Sarah Allison Thornton
Clerk

Certificate of Service by Hand

I, Robin Cook, an associate of Weil, Gotshal and Manges LLP, do hereby certify, under penalty of perjury, that I have caused a copy of the annexed document to be served by hand delivery today upon:

Robert William Yalen
Kirti Vaidya Reddy
Assistant U.S. Attorneys
86 Chambers Street
New York, New York 10007

New York, New York

Dated: July 9, 2008